

April 12, 2019

VIA ECFS

Wireless Telecommunications Bureau
Office of Engineering Technology
Federal Communications Commission
441 12th Street, SW
Washington, DC 20006

Re: Sony Corporation Spectrum Access System
Amendment to Initial Commercial Deployment Proposal
GN Docket 15-319

To whom it may concern:

Sony Corporation (“Sony”) submits the following amendment to its proposal for Initial Commercial Deployment (“ICD”) of its Spectrum Access System (“SAS”), which was submitted in the above-referenced proceeding on September 10, 2018.

Pursuant to Section 0.459 of the Commission’s rules, Sony requests confidential treatment for this amendment. It includes commercial information and trade secrets regarding the implementation details of Sony’s ICD proposal, and public disclosure would undermine Sony’s ability to offer a competitive SAS. This information has not previously been shared outside of Sony, including to the public or to third parties. Sony asks that its original ICD submission and this amendment remain confidential until the proposal as amended has been approved and implemented, at which point any potential for competitive harm will no longer exist. Alternatively, Sony asks that the Commission return this filing if this request for confidentiality is denied. Sony consents to the sharing of its non-redacted response with other Federal government agencies.

Please contact the undersigned with any questions about this submission or confidentiality request.

Respectfully submitted,

/s/ _____
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